

BB

IN THE UNITED STATES DISTRICT COURT FOR
 THE NORTHERN DISTRICT OF ILLINOIS
FILED
 EASTERN DIVISION

JAN 23 2008 aew

Jan 23 2008

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURTLOUIS C. SHEPTIN,
PLAINTIFF

PAGE # 08-C-0116

VERSUS

Hon. M. Kennedy, Judge

DR. D. HARVEY, CLINICAL, JURY TRIAL DEMANDED
DIRECTOR MCC,
DEFENDANT

(EMERGENCY ACTION)

EMERGENCY ACTION:

PLAINTIFF'S COMPLAINT AND MOTION
 TO CONVERT THIS ACTION TO
 A DIVISIONS COMPLAINT WITHOUT
 NECESSITY OF EXHAUSTING
 ADMINISTRATIVE REMEDIES BASED
 ON PROOF IMMINENT BODILY

DANGER

MCC CHICAGO PHARMACY (312) 322-0567-
 71 W. VAN BUREN - CHICAGO, IL 60605
 107093 P. HARVEY 01/16/08
 SHEPTIN, LOUIS CHARLES 90355-024
 MCC CHICAGO - 003-019L
 TAKE ONE TABLET BY MOUTH EACH DAY

1/16/08
mmp

AMLODIPINE 10 MG TAB #30
 (0) Refills 01/16/2008 IL EXPIRE 02/14/08
 CAUTION: Federal/State law prohibits transfer of this drug
 to any person other than patient for whom prescribed.

WAS TOLD TO TAKE THIS
 MEDICATION OR BE PUT
 IN SHOT FOR FAILURE
 TO FOLLOW DIRECT ORDER

I. JURISDICTION:

1) THE JURISDICTION OF THIS HONORABLE COURT IS INVOKED PURSUANT TO TITLE 28 USC 1331, OR IN THE ALTERNATIVE PLAINTIFF SEEKS HIS RELEASE UNDER 28 USC 2241, WRIT OF HABEAS CORPUS SEE ALSO 28 USC 1651 ALL WAITS ACT.

II. Statement of Case & Facts:

2) THE PLAINTIFF INCORPORATES HEREIN HIS APPLICATION FOR WRIT OF HABEAS CORPUS AND SUPPLEMENT THEREETO WITH EXHIBITS ATTACHED THEREETO, SHOWING HIS RECORDS DATED 12/7/2007/2008
SEE Doc 1, 2, 3, and 4

3) PLAINTIFF CITES THAT BASED UPON MEDICAL RECORDS HE IS HYPERTENSIVE AND TAKES NO MEDICATION TO LOWER BLOOD PRESSURE; AND THAT MEDICATIONS TO LOWER BLOOD PRESSURE COULD KILL PLAINTIFF OR COLLAPSE A STENTED ARTERY¹, OR CAUSE MI.

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¹ Is Precisely A Newly Stented Artery.

PLAINTIFF HAS NEVER TAKEN OR BEEN PRESCRIBED ANTI HYPERTENSIVES

4) THAT AS LATE AS JANUARY 16, 2008

AS EVIDENCED BY MEDICATION LIST

ADDED TO PAGE ONE, DR. HARVEY

CONTINUES TO PRESCRIBE THOMAS T. CAUL'S

BLOOD PRESSURE MEDICATION TO

PLAINTIFF, DESPITE THE FACT THAT

RECORDS SHOW PLAINTIFF HAS BEEN

HOSPITALIZED WITH LOW BLOOD PRESSURE

AND AS RECENT AS JANUARY 9, 2008

WAS HOSPITALIZED WITH PTCA ANGIO-

PLASTY, AND WAS STENTED AT U.I.C. MED CENTER.

5) PLAINTIFF BELIEVES HARVEY IS TRYING

TO DO SOMETHING HARMFUL TO PLAINTIFF,
AND / OR TRYING TO CAUSE CARDIAC
COLLAPSE BY PRESCRIBING NORVASC -
AMLODIPINE 10 MG., TO PLAINTIFF WHEN
THIS MEDICATION IS NOT MONITORING IMPLEMENTED.

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II PLAINTIFF WARNED HARVEY ON 12/26/08 OF THIS ERROR.

b) Because of Defendant's CONTINUED
ATTEMPTS ON PLAINTIFF'S LIFE OR
CONTINUED gross NEGLIGENCE your
PLAINTIFF moves for the following
RELEIF: TRIAL ON MERITS AND:

III RELEIF:

- 1) FIND THAT Plaintiff faces
IMMINENT BODILY DANGER AT THE
HANDS OF DEFENDANT P. Harvey.
- 2) AWARD PUNITIVE DAMAGES OF
ONE MILLION DOLLARS.
- 3) AWARD COMPENSATION IN AN
AMOUNT THE COURT DEEMS JUST
AND PROPER, OR IN THE ALTERNATIVE
RELEASE Plaintiff FROM CONFINEMENT
WHICH PLACES Plaintiff IN IMMEDIATE
BODILY DANGER, AND AWARD ATTORNEY FEES AND
COSTS OF COURT AND;
- 4) AS PROOF OF DEFENDANT'S GROSS
ATTEMPT ON PLAINTIFF'S LIFE IT SHOWS

AN ELECTROCARDIOGRAM TAKEN ON
December 07, 2007 WHICH A BLOOD
PRESSURE RECORDED ON PRESENT OF
94/43 (HYPOTENSIVE). ADDITIONALLY
PLAINTIFF ATTACHES A COPY OF HIS
DISCHARGE MEDICATIONS, NONE OF
WHICH ARE FOR BLOOD PRESSURE.

PLAINTIFF SEEKS THE IMMEDIATE
RELIEF OF THIS COMPLAINT ON HARVEY
WITH THE RE-APPOINTMENT OF JENKIN
AND BLOCK PRO BONO. SO PRAYS YOUR PLAINTIFF

Most Respectfully Submitted
John Clark Opton

Henry Charles Opton
71 West Van Buren St
Chicago, IL 60605

ATTACHMENTS EXHIBIT MARKED 'B' DISCHARGE MEDICATION
EXHIBIT MARKED "C" EKG WITH BP 89/43

Saint Anthony Hospital
1000 North Lee, Oklahoma City, Oklahoma 73102

Inpatient Discharge Instructions

ST ANTHONY HOSPITAL

* SHEPTIN, LOUIS I/P

0734100419 CAR 3005-01

10/23/1948 59Y M 12/07/07

SUTOR, RONALD 000511770

Diagnoses and Comments:

CAD stp Stent Seizure Disorder

HT AFib

Shoulder soft tissue injury

Hepatitis C

GERD

Appointments:

Physician: Dr. Esteban Radical Clinic date/time:

Special Instructions:

Diet: Healthy Diet

Activity: No lifting for 1 week

Other: (laboratory, physical therapy, return to work, etc)

Home Health:

phone:

Medications: (name, dosage, how often)

Ec Asprin 325 daily po

Plavix 75mg

Vitamin 10140 every evening

Sotalol 40mg

Zantac 150mg twice daily

Dilantin 300 mg everyday

NTG 0.4mg 5 L PRN chest pain

Ibuprofen 325 1-2 tabs q 4 hrs PRN pain

If you have questions, call:

phone:

"I understand, and have received a copy of this discharge plan."

(signature of patient or guardian):

date: 12-10-07

Physician signature:

date:

discharging nurse:

date: 12-10-07

faxed to:

fax number:

date & time faxed:

initials:

B

Sinus rhythm

Left axis deviation - anterior fascicular block
Possible old inferior infarct
Possible anterior infarct

Abnormal ECG

* Unconfirmed Analysis *

12/07/07 8:30:10

SHEPTIN, LOUIS
ID: 90355024

MALE	Vent.	Rate:	73 bpm
Meds:		P Duration:	102 ms
Class:		QRS Duration:	94 ms
Loc:		PR Interval:	176 ms
Dr:	WILES	QT Interval:	408 ms
Tech:		QTc Interval:	429 ms
		QT Dispersion:	40 ms
		P-R-T AXIS:	77° -73° 89°

ECG 11/2007
Tom F. Gafford, MD
PPC Cardiology, Inc., OK
L. Wiles, MD
FJC Oklahoma City, OK